



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



DEC 10 2013

Raymond Rodriguez
Occidental of Elk Hills, Inc.
PO Box 1001
Tupman, CA 93276

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-2234
Project # S-1134083

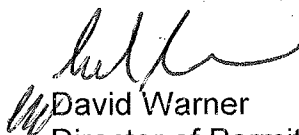
Dear Mr. Rodriguez:

The Air Pollution Control Officer has modified the Title V permit for Occidental of Elk Hills, Inc. by incorporating modifications to Permit to Operate S-2234-4-8. The modification involves clarifying condition 6 in the current permit so the vapor pressure limit does not apply when transferring liquefied petroleum gas (i.e. propane and butane) pursuant to District Rule 4624, Section 5.4.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on October 25, 2013. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

DW:spl

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email
Gerardo Scandura
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-4-9

EXPIRATION DATE: 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

NATURAL GASOLINE, BUTANE, AND PROPANE LOADING RACK CONSISTING OF 7 LOADING ISLANDS, 7 LOADING STATIONS, 14 HOSES, 14 VAPOR RETURN LINES AND A VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with two 15 hp product transfer pumps. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from the vapor collection and control system shall be determined using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. After an initial compliance determination, determinations shall be made whenever an inspection reveals conditions indicative of performance less effective than that during previous compliance determinations. [District Rule 4624] Federally Enforceable Through Title V Permit
3. Loading rack shall incorporate vapor loss collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Nitrogen purge system shall be a closed system such that all VOC's are displaced to the vapor control system via closed piping for reprocessing in S-2234-3. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that VOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [District Rule 4624 and Kern County Rule 413] Federally Enforceable Through Title V Permit
6. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum except when transferring liquefied petroleum gas. [District Rule 4624] Federally Enforceable Through Title V Permit
7. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
8. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnection. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624 and Kern County Rule 413] Federally Enforceable Through Title V Permit
9. Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. TVP shall be measured using Reid vapor pressure ASTM Method No. D-323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 deg F, TVP may be determined by Reid Vapor pressure at 100 deg F and ARB approved calculations. [District Rule 4624] Federally Enforceable Through Title V Permit
12. TVP of crude oil with an API gravity less than 30ø as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4624] Federally Enforceable Through Title V Permit
13. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane and air at a concentration of about, but less than, 10,000 ppm methane. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
16. Each detected leak shall be repaired within 15 calendar days of detection. [District Rule 2520] Federally Enforceable Through Title V Permit
17. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520] Federally Enforceable Through Title V Permit
18. All records necessary to determine compliance with the VOC emission limit for this unit shall be maintained for a period of at least 5 years and shall include component counts and recognized emission factors for fugitive emission sources. [District Rule 2520] Federally Enforceable Through Title V Permit
19. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of + or - 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520] Federally Enforceable Through Title V Permit
20. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the requirements of Kern County Rule 413. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the following requirements: District Rule 4624 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.